

From: Julie Metts
To: Eller, Joseph
Date: 11/20/2008 4:49:00 PM
Subject: CO Data

Joe,

Per DHEC's request, Santee Cooper provides the attached CO monitoring data from its Cross Generating Station, Unit 1. It was no small effort, and Santee Cooper appreciates the opportunity to provide the requested information. Over the last several weeks, Santee Cooper mobilized a performance test crew to sample and analyze continuous CO emissions from the Unit 1 stack. The total effort involved 30 regular and 120 overtime technician man-hours, along with engineering data compilation, and legal and management review, costing nearly \$15,000 for labor and materials.

As you can see in the attached spreadsheet, the 30-day average CO value was 0.16 lb/MMBtu for Cross Unit 1, which further supports the CO limit of 0.15 lb/MMBtu and NOx limit of 0.07 lb/MMBtu SCDHEC has set forth in the Draft PSD and NOMA for the Pee Dee Energy Campus. Please note, Cross 1 maintains a 0.100 lb/MMBTU NOx limit on a 30-day basis with margin; the average NOx value for Cross 1 during this period was 0.08 lb/MMBtu. In addition, the stringency of the proposed 0.15 lb/MMBtu CO emissions rate for Pee Dee Station is further reflected by the following considerations: First, Cross 1 has a higher limit/operating level for NOx than what is projected for the Pee Dee Station. Pee Dee will need to operation well below 0.07 lb/MMBtu to ensure compliance with the applicable NOx limit. Second, CO emissions data provided in the attached spreadsheet indicate that Cross 1 had higher and less predictable CO emissions when the unit operated at the higher output levels. Notably, these higher output levels are the same levels at which the Pee Dee Station will be operating as a baseload unit in the Santee Cooper System.

The Department's email request on 10/03/08:

"In addition, Santee Cooper indicated in one of the recent conference calls willingness to conduct a 30-day continuous monitoring sample of CO emissions from one of the Cross units as supporting justification to maintain the CO emission limit in the NOMA at the same level as the draft PSD permit for the Pee Dee Generating Station (0.15 pounds/million BTU). The Bureau believes the results of that test will be valuable and requests Santee Cooper to proceed if not already initiated."

Please confirm receipt of this email. Again, thank you for the opportunity to provide the requested information. Call me or Kevin (x5193) if you have any questions.

Julie Jordan Metts, P.E.
Supervisor, Air Quality
Environmental Management (A203)
Santee Cooper
office: 843/761-8000 ext. 4688
mobile: 843/729-8823
fax: 843/761-4156

jjmetts@santeecooper.com

CC: Barringer, Veronica; Basil, Elizabeth; Clark, Kevin; Hudson, Jay;
Warner, Elizabeth